

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CHRISTINA D. EASTER

5 Wenden Court
Bratenahl, Ohio 44108

Plaintiff,

vs.

JANET YELLEN,
Secretary Department of Treasury,
C/O LISA MONACO
Attorney General, U. S. Department
of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

JANET YELLEN,
Secretary Department of Treasury
C/O CAROL SKUTNIK
United States Attorney for
the Northern District of Ohio
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

Defendants, et al.

CASE No.

JUDGE

MAGISTRATE JUDGE

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION

(Jury Demand Endorsed Hereon)

I. NATURE OF ACTION

Plaintiff, Christina D. Easter ("Plaintiff"), an employee of **Janet Yellen**, Secretary of the Department of the Treasury ("Defendant Treasury"), brings this action under **Title VII of the Civil Rights Acts of 1964** as amended, **42 U.S.C. § 2000 et seq.**, **42 U.S.C. § 2000e-2(c)**, and **2000e-5(k)**, the **Civil Rights Act of 1991**, as amended, ("Title VII"), and **42 U.S.C. §§ 1981**, as amended, and **1981 (a)** and **1981 (b)** to correct unlawful pervasive and systemic discriminatory disparate treatment based upon her race, **African American** and sex,

Female. Plaintiff has also been subjected to unlawful retaliation for having previously engaged in protected activity against her, by Defendant Treasury employees, **Allyson Belsome**-Field Operations Manager, Tax Exempt Bonds ("TEB") ("**Belsome**") and **Randal Webb**-Group Manager, TEB ("**Webb**"). **Belsome** has directed and perpetuated the discriminatory racial discrimination and sex discrimination against **Plaintiff**, through her immediate supervisor, **Webb** since at least December 2020.¹

I. **Introduction**

This Complaint alleges that the **Department of the Treasury**, though, supervisors **Belsome** and **Webb** discriminatorily terminated her detail to the **Financial Investigation Unit** ("FIU").² **Plaintiff** was employed on the **FIU** detail for two (2) years and had accepted **FIU's** request for a third year, before **Belsome** intervened and terminated the detail. **Belsome** falsely alleged that the detail was terminated because **Plaintiff** was a valuable **TEB**. **Plaintiff** contends **Belsome**³ specifically and **Defendant Treasury** have never during her twenty-nine (29) year career treated her as a valuable employee. **Plaintiff** contends that the **Department of the Treasury** for the purpose of concealing **Belsome's** racial and sex-based animus against **Plaintiff**, who is a African American, female, falsely claimed that **Defendant Treasury** employees other than **Belsome** made the decision to terminate **Plaintiff's** detail to **FIU**.

¹ Both **Belsome** and **Webb** are White.

² **FIU** is a separate division of Defendant Treasury where **Plaintiff** was able to expand her knowledge of the Tax Laws and network with other Defendant Treasury employees.

³ **Belsome** is a White, female and **Webb** is a White, male.

II. JURISDICTION AND VENUE

1. This Court has jurisdiction of the claims herein pursuant to 28 U.S.C. §§ 451, 1331, 1332, 1337 and 1343(4). This civil action arises under the Constitution and laws of the United States. **Plaintiff** is alleging a violation of **her** rights under Title VII of the Civil Rights Act of 1964, as amended. Jurisdiction is also invoked pursuant to C.F.R. §§ **1614.408**. (See Exhibit 1).

III. PARTIES-INTRODUCTION

2. **Plaintiff** is a citizen of the United States and resident of the Village of Bratenahl, Cuyahoga County, and the State of Ohio, and **Defendant Treasury's** principal office is located in Washinton, D.C.
3. **Plaintiff**, who is **African American**, and **female** has been employed by **Defendant Treasury** for nearly **thirty (30) years** most recently Internal Revenue Office, 6450 Rockside Woods Blvd., S, Suite 300-Stop 408, Independence, Ohio 44131.
4. On or about **January 6, 2023**, **Belsome** terminated **Plaintiff's** detail to **FIU**, after **FIU** had requested that the detail be extended and after **Plaintiff** had accepted the offer.
5. **Plaintiff** alleges that similarly situated White employees and male employees under **Belsome's** supervision were permitted to have their details extended to a third year.
6. **Plaintiff** alleges that employees who did not engage in protected activity against **Defendant Treasury** and **Belsome**, were permitted to have their details extended for a third year.

7. Plaintiff alleges that the **Department of the Treasury** and **Belsome** violated her rights to make and enforce contracts and to rights and privileges stated in said contract(s) pursuant to **42 U.S.C. § § 1981, (a) and (b)**, under the **NTEU Collective Bargaining Agreement** ("CBA"), in effect in on January 6, 2023. (The CBA will be attached to a subsequent pleading).

COUNT ONE-RACE DISCRIMINATION
42 U.S.C. § 2000 e-2

8. **Plaintiff** incorporates by reference each and every allegation, averment and statement set forth, herein above, in paragraph nos. one (1) through seven (7), as if fully restated, herein below, and states further as follows.
9. **Plaintiff** alleges that the facts set forth herein above in ¶ 6, constitutes unlawful retaliation in employment, in violation of **Title VII**, by the **Department of the Treasury** and **Belsome**.
10. As a result of the unlawful retaliatory conduct by the **Department of the Treasury** and **Belsome**, **Plaintiff** has sustained compensatory damages for anxiety, humiliation, embarrassment, and emotional distress, in an amount greater than \$25,000.00 to be proven at trial.

COUNT THREE-BREACH OF CONTRACT
42 U.S.C. §§ 1981 (a) and (b)

11. **Plaintiff** incorporates by reference each and every allegation, averment and statement set forth, herein above, in paragraph nos. one (1) through ten (10), as if fully restated, herein below, and states further as follows.
12. **Plaintiff** alleges that the facts set forth herein above in ¶ 7, constitutes an unlawful breach of contract by denying her rights to make and enforce contracts based upon her race, **African American**, in violation of **42 U.S.C. §§ 1981, (a) and (b)**.
13. As a result of the unlawful violation of **Plaintiff's** rights under **U.S.C. §§ 1981, (a) and (b)**, **Plaintiff** has sustained compensatory damages for anxiety, humiliation, embarrassment, and emotional distress, in an amount greater than \$25,000.00 to be proven at trial.

WHEREFORE, Plaintiff, prays that this Court enter judgment on **her Complaint**, against the **Department of the Treasury** as follows:

1. On **Count One**, for compensatory damages, in an amount greater than \$25,000.00, and punitive damages in an amount to be determined at trial.
2. On **Count Two**, compensatory damages, in an amount greater than \$25,000.00, to be determined at trial.
3. On Count **Three**, for compensatory damages, in an amount greater than \$25,000.00, to be determined at trial.
4. Attorneys' fees and costs pursuant to 42 U.S.C. § 1988; and
5. Any and all other relief that this Honorable Court determines is appropriate and just.

Respectfully submitted,

/s/James L. Hardiman

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Attorney for Plaintiff
Christina D. Easter

JURY DEMAND

Plaintiff hereby demands a trial by jury, pursuant to Fed. R. Civ. P. 38 (b).

/s/James L. Hardiman

James L. Hardiman (0031043)